

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>SPRINGHILL AVENUE UNITED</b>	)	
<b>METHODIST CHURCH, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:24-cv-00375-KD-B</b>
	)	
<b>NATIONS ROOF GULF COAST,</b>	)	<b>UNOPPOSED</b>
<b>LLC, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**NATIONS ROOF GULF COAST, LLC’S**  
**UNOPPOSED MOTION TO LIFT STAY**

Defendant Nations Roof Gulf Coast, LLC (“Nations Roof”) respectfully moves this Court to lift the stay of the claims against it so it can file the Unopposed Motion for Leave to File Third-Party Complaint attached as Exhibit 1 and pursue its third-party claims against Roof US, LLC and Roof US Roofing and Restoration, LLC (collectively, “Roof US”). In support of this motion, Nations Roof states as follows:

1. On March 7, 2025, the Court entered an order staying Plaintiff’s claims against Nations Roof and compelling those claims to arbitration. (ECF No. 22.) Plaintiff and Nations Roof then submitted those claims to arbitration with Arbitrator Jarrod White.

2. Nations Roof has determined that it is proper and necessary to join Roof US as third-party defendants under Rule 14 of the Federal Rules of Civil Procedure. Nations Roof hired Roof US as the subcontractor responsible for performing the roofing work at issue and is entitled to indemnification from Roof US.

3. To avoid burdening this Court with this motion and with anticipated future filings, counsel for Nations Roof, on several occasions, asked counsel for Roof US to agree to submit the parties' dispute to the ongoing arbitration with Arbitrator Jarrod White. Counsel for Roof US has not agreed to do so voluntarily.

4. A lift of the stay is necessary for Nations Roof to file its Unopposed Motion for Leave to File Third-Party Complaint and, with leave of court, join Roof US to this action.

5. Counsel for Nations Roof conferred with counsel for all other parties in this action, and they advised that they do not oppose this motion.

6. Accordingly, Nations Roof respectfully requests this Court enter an order lifting the stay of the claims against it so it can file the Unopposed Motion for Leave to File Third-Party Complaint attached as Exhibit 1 and pursue its claims against Roof US.

Respectfully submitted this 22nd day of May, 2025.

/s/ Jorge A. Solis  
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*Counsel for Nations Roof Gulf Coast, LLC  
(Defendant)*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all parties to this action by e-file using the Court's CM/ECF system, electronic mail and/or by depositing a copy of the same in the U.S. Mail, first-class postage prepaid and properly addressed as follows:

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Done this the 22nd day of May, 2025.

/s/ Jorge A. Solis  
OF COUNSEL